

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**CITY OF HUNTINGTON,  
Plaintiff,**

**v.  
AMERISOURCEBERGEN DRUG  
CORPORATION, et al.,  
Defendants.**

---

**CIVIL ACTION NO. 3:17-01362**

**CABELL COUNTY COMMISSION,  
Plaintiff,**

**v.  
AMERISOURCEBERGEN DRUG  
CORPORATION, et al.,  
Defendants.**

*Consolidated case:*

**CIVIL ACTION NO. 3:17-01665**

**NOTICE OF REMOTE VIDEOTAPED DEPOSITION OF MATT PATTON**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, pursuant to the applicable Federal Rules of Civil Procedure and the Deposition Protocol governing this litigation, Plaintiffs, by and through undersigned counsel, will take the oral videotaped deposition of **MATT PATTON, on July 24, 2020, beginning at 9:00 a.m. Eastern Standard Time, remotely**, pursuant to the Court's Order Establishing Remote Deposition Protocol Due to Covid-19 [Dkt. 564].

The deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The oral examination is to be taken for purposes of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure, the local rules of the United States District Court for the Southern District of West Virginia, and all Pretrial Orders and Case Management Orders entered by the Court. Court reporting services and video recording services will be provided by Golkow Global Litigation

Services. Parties who wish to attend may RSVP to the deposition by emailing [scheduling@golkow.com](mailto:scheduling@golkow.com).

Dated: July 17, 2020

Respectfully submitted,

Plaintiffs,

THE CITY OF HUNTINGTON and  
CABELL COUNTY COMMISSION

/s/ Michael J. Fuller, Jr.

Michael J. Fuller, Jr. (WV Bar No. 10150)  
**McHUGH FULLER LAW GROUP, PLLC**  
97 Elias Whiddon Rd.  
Hattiesburg, MS 39402  
T: 601-261-2220  
F: 601-261-2481  
[mike@mchughfuller.com](mailto:mike@mchughfuller.com)

Paul T. Farrell, Jr. (WVSB No. 7443)  
**FARRELL LAW**  
422 Ninth Street, 3<sup>rd</sup> Floor (25701)  
P.O. Box 1180  
Huntington, WV 25714-1180  
Tel: 304-654-8281  
[paul@farrell.law](mailto:paul@farrell.law)

Anne McGinness Kearse (WVSB No. 12547)  
Joseph F. Rice  
**MOTLEY RICE LLC**  
28 Bridgeside Blvd.  
Mount Pleasant, SC 29464  
Tel: 843-216-9000  
Fax: 843-216-9450  
[akearse@motleyrice.com](mailto:akearse@motleyrice.com)  
[jrice@motleyrice.com](mailto:jrice@motleyrice.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 17, 2020, a copy of the foregoing **NOTICE OF REMOTE VIDEOTAPED DEPOSITION OF MATT PATTON** has been filed electronically using the Court's CM/ECF system and will be served *via* the Court's CM/ECF filing system, which will send notification of such filing to the attorneys of record at their e-mail addresses on file with the Court.

/s/ Michael J. Fuller, Jr..

Michael J. Fuller, Jr.